

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

**BY: Christian M. Scheuerman, Esquire**  
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**ATTORNEY FOR DEFENDANT**  
**Healthcare Revenue Recovery**  
**Group, LLC**

447-102973(SXK/CMS)

Elaine Levins and William Levins, on  
behalf of themselves and others similarly  
situated

vs.

Healthcare Revenue Recovery Group,  
LLC d/b/a ARS Account Resolution  
Services

UNITED STATES  
DISTRICT COURT  
CAMDEN VICINAGE

DOCKET NO. 1:17-cv-00928-  
RBK-KMW

CIVIL ACTION

**DECLARATION OF COUNSEL**

I, Christian M. Scheuerman, Esquire, of full age, do hereby declare as follows:

1. I am an attorney-at-law, licensed to practice in the Federal District Courts of New Jersey and the Eastern District of Pennsylvania, and am a partner at the law firm of Marks, O'Neill, O'Brien, Doherty & Kelly, P.C., attorneys for Defendant Healthcare Revenue Recovery Group, LLC. I am fully familiar with the facts and circumstances of the above-captioned matter.

2. I make this declaration based on personal knowledge.

3. Exhibit A is a true and accurate copy of the complaint.

4. Exhibit B is a true and accurate copy of the amended complaint.

5. Exhibit C is a true and accurate copy of the September 26, 2017 Order and Opinion.

6. Exhibit D is a true and accurate copy of the August 22, 2018 Third Circuit Opinion.

7. Exhibit E is a true and accurate copy of Defendant's alternative trade name registration.

8. Exhibit F is a true and accurate copy of portions of David Friedlander's deposition transcript.

9. Exhibit G is a true and accurate copy of Defendant's interrogatory answers.

10. Exhibit H is a true and accurate copy of the November 30, 2015 ARS letter to Plaintiffs.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

/s/ Christian M. Scheuerman, Esquire  
Christian M. Scheuerman, Esquire